

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN DOE,
Plaintiff

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No. 1:22-cv-10091-RGS

v.

CITY OF SOMERVILLE,
JOSH WAIRI,
Defendants

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AFFIDAVIT OF JOHN DOE

1. I am the individual identified as John Doe in the above action.
2. I execute this affidavit based on my own memory and belief and in support of Plaintiff's Motion for Default Judgment Against Defendant Wairi.
3. I brought the above action, which is a case arising out of my teacher filming me in the nude without my knowledge or consent when I was a minor.
4. The allegations in that complaint that relate to me are accurate to the best of my memory and belief.
5. Specifically, I was a student at the Healey School and attended the field trip where Defendant Wairi filmed boys in the shower.
6. As a result of this intrusion and betrayal of trust, I have suffered and continue to suffer from severe emotional distress.
7. I trusted and liked Wairi, my teacher, and he abused me and my classmates for his own sexual gratification.
8. In the years since the field trip, I learned that Defendant Wairi comingled the footage from the field trip with his other child pornography.
9. I also learned that Defendant Wairi has shared parts of his child pornography collection with others.
10. This information is particularly devastating because I do not know where the images of me may be, who may currently have them, if I am identifiable, and if they have continued to be distributed.
11. Because of Defendant Wairi's actions, I don't trust authority figures, particularly teachers.

12. I suffer from sleep disturbances, insomnia, hopelessness, fear of crowds, intrusive memories, and disturbing memories.
13. Because I don't know where the images of me are, the abuse isn't a distant memory. Instead, I worry that I will learn that the images are still out there being shared.
14. In high school, I sporadically spoke to a therapist, but I didn't find the sessions helpful.
15. As a young man, I continue to think about what happened to me and try to move forward. It's likely that I will return to therapy or seek other treatment in the future.

Signed under the pains and penalties of perjury on January 4, 2023.


John Doe
John Doe [Jan 4, 2023 13:42 EST]